

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MICHAEL L. KATHREIN *and*)
VICTORIA KATHREIN, on behalf)
of herself and all others)
similarly situated,)

Plaintiffs,)

v.)

CITY OF EVANSTON, ILLINOIS,)
LORRAINE H. MORTON, Mayor,)
CHERYL WOLLIN,)
1st Ward Alderman, City Council,)
LIONEL JEAN-BAPTISTE,)
2nd Ward Alderman, City Council,)
MELISSA A. WYNNE,)
3rd Ward Alderman, City Council,)
STEVEN J. BERNSTEIN,)
4th Ward Alderman, City Council,)
DELORES A. HOLMES,)
5th Ward Alderman, City Council,)
EDMUND B. MORAN, Jr.,)
6th Ward Alderman, City Council,)
ELIZABETH B. TISDAHL,)
7th Ward Alderman, City Council,)
ANN RAINEY,)
8th Ward Alderman, City Council,)
ANJANA HANSEN,)
9th Ward Alderman, City Council,)

Defendants.)

08 C 0083

**PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION**

JUDGE RONALD A. GUZMAN
MAGISTRATE JUDGE SCHENKIER

**PLAINTIFF VICTORIA KATHREIN'S
MOTION FOR LEAVE TO FILE *INSTANTER* AN
AMENDED AND SUBSTITUTED MEMORANDUM IN SUPPORT OF HER
MOTION FOR CLASS CERTIFICATION**

Comes Victoria Kathrein, through her counsel, Adrian Vuckovich and James J.
Lessmeister of Collins Bargione & Vuckovich, and for her Motion for Leave to File an Amended

and Substituted Memorandum in Support of Plaintiff Victoria Kathrein's Motion for Class Certification states as follows:

1. On April 14, 2008, Victoria Kathrein filed her Motion for Class Certification and supporting Memorandum. See Document 34.

2. Upon review of the Memorandum, we ask for leave to submit the more cogent and complete Amended and Substituted Memorandum which is attached hereto as Exhibit A.

3. The Amended Memorandum will have Victoria Kathrein's declaration. There are minor changes to foot note 2 to the Memorandum and minor grammatical changes. There is no declaration from Adrian Vuckovich and reference to such has been deleted in the Amended and Substituted Memorandum.

4. There is no prejudice to the Defendants for the presentment of the motion is not until Tuesday, April 29, 2008.

Wherefore, plaintiff Victoria Kathrein request that she be granted leave to file *instanter* her Amended and Substituted Memorandum in support of her Motion for Class Certification.

Respectfully submitted,

Dated: April 23, 2008

/s/ Adrian M. Vuckovich

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